

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

LEHMAN BROTHERS SECURITIES AND
ERISA LITIGATION

This document applies to:

09 MD 2017 (LAK)

In re Lehman Brothers Equity/Debt Sec. Litig.
08 Civ. 5523 (LAK)

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**NOTICE OF THE STRUCTURED PRODUCT PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION AND
APPOINTMENT OF CLASS REPRESENTATIVES
AND CLASS COUNSEL**

PLEASE TAKE NOTICE that the Structured Product plaintiffs, by their counsel, move this Court before the Honorable Lewis A. Kaplan, United States District Court Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 11D, New York, New York for an order pursuant to Federal Rule of Civil Procedure 23:

(1) certifying a class consisting of all persons who bought or otherwise acquired the Lehman-issued structured products sold by UBS Financial Services, Inc. that are identified in Appendix A to the memorandum (the “Structured Products”); (2) appointing the Structured Product plaintiffs as class representatives; and (3) appointing Girard Gibbs LLP as class counsel for the Structured Product class.

In support of this motion plaintiffs submit a memorandum of law and the declaration of Daniel C. Girard with exhibits.

Dated: February 3, 2012

Respectfully submitted,

GIRARD GIBBS LLP

By: /s/ Daniel C. Girard
Daniel C. Girard

Jonathan K. Levine
Amanda M. Steiner
Dena Connolly Sharp
601 California Street, Floor 14
San Francisco, CA 94108
Tel: (415) 981-4800
Fax: (415) 981-4846

Counsel for Plaintiffs Mohan Ananda, Richard Barrett, Neel Duncan, Nick Fotinos, Stephen Gott, Karin Kano, Barbara Moskowitz, Ronald Profili, Lawrence Rose, Joe Rottman, Grace Wang and Miriam Wolf

**ZWERLING, SCHACHTER
& ZWERLING, LLP**

Susan Salvetti
Justin M. Tarshis
41 Madison Avenue
New York, New York 10010
Telephone: (212) 223-3900
Facsimile: (212) 371-5969

*Counsel for Plaintiffs Ed Davis, Rick Fleischman, J.
Harry Pickle, Trustee Gastroenterology Associates,
Ltd. Profit Sharing Plan FBO Charles M. Brooks
M.D., Arthur Simons, Juan Tolosa*

LAW OFFICES OF JAMES V. BASHIAN, P.C.

James V. Bashian
500 Fifth Avenue, Suite 2700
New York, New York 10110
Telephone: (212) 921-4110
Facsimile: (212) 921-4229

Counsel for Plaintiff David Kotz

**BONNETT FAIRBOURN FRIEDMAN
& BALINT, P.C.**

Andrew Friedman
2901 North Central Avenue, Suite 1000
Phoenix, Arizona 85012
Telephone: (602) 274-1100
Facsimile: (602) 274 1199

TIFFANY & BOSCO P.A.

Richard G. Himelrick
2525 East Camelback Road
Phoenix, Arizona 85016
Telephone: (602) 255-6000
Facsimile: (602) 255-0103

*Counsel for Plaintiff Shea-Edwards Limited
Partnership*